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EX PARTE OR LATE FILED

November 22, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TWB-204
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Notice of Written Ex Parte
Second Application of BellSouth Corporation, BellSouth
Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision
of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121

Dear Ms. Salas:

In response to a series ex parte submissions filed by BellSouth, AT&T is making this written ex parte submission to Jake Jennings, Andrea Kearney and Bill Agee of the Commission's Common Carrier Bureau.

First, in response to BellSouth's October 1, 1999 ex parte submission on the level of activity before the Georgia Public Service Commission in dockets addressing OSS and performance measurement issues, AT&T is submitting Attachment A. As demonstrated by the information compiled in Attachment A, the record in many of the relevant dockets in Georgia has become stale as there has been no evidentiary activities in those dockets for well over a year. The last evidentiary hearing in Georgia's primary 271/SGAT docket (Docket Nos. 6863-U and 7253-U) was in July 1997.

Attachment B responds to BellSouth's October 8, 1999 ex parte submission in which BellSouth compared the Georgia and the Florida Third Party Test Plans. As AT&T's response demonstrates, the Georgia plan continues to suffer from numerous deficiencies and fails to address many critical issues properly included within the scope of the Florida plan. Moreover, AT&T is continuing to work through the open process in Florida to resolve additional issues with that test plan.


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Finally, AT&T is submitting an analysis of the most recent revision of the BellSouth Georgia Third Party Test Plan in light of the advice and guidance provided by the Bureau in its September 27, 1999 letter to US West. AT&T believes that the guidance provided in that letter only underscores the continuing deficiencies with the Georgia test plan.

Please phone with any questions.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in cursive script that reads "Joan Marsh (gs)".

Joan Marsh

cc: W. Agee
J. Jennings
A. Kearney

AT&T's Response to Bell South's Summary of OSS and Performance Measurement Dockets – Georgia

I. Docket 6352 – Resale Docket

- No substantive activity in docket in more than two years. Monthly reports filed through July 1998. In August 1998, BellSouth notified GPSC that it was discontinuing its monthly filing and incorporating this into Docket No. 8354-U filing (OSS Docket).

II. Docket 6863-U and 7253-U – 271/SGAT Dockets

- Last evidentiary hearing (on any 271 related topic) held in July 1997.
- Last filing on 271 compliance was in first quarter 1999. GPSC required single set of comments by all CLECs in March 1999 with strict page limitations.
- No effort has been made since then by the GPSC to update record.

III. Docket 8354-U – OSS Docket

- Last evidentiary hearing held in March 1998.
- Although BellSouth/CLECs file monthly OSS status report, issue list has not been updated since it was originally developed in 1998, and GPSC pays little attention to monthly filing.

IV. Docket 7892-U – Performance Measurements

- Last evidentiary hearing held in November 1997.
- No GPSC review of performance measurements since then.
- GPSC has not taken steps to implement key performance measurement issues:
 - ◆ No self enforcing penalties
 - ◆ No audit of data provided by BellSouth
 - ◆ No additional disaggregation of data
 - ◆ No statistical analysis / methodology

- ◆ No analogs provided
- Commission has not attempted to get data from CLECs, relying solely on unaudited BellSouth data.

AT&T'S RESPONSE TO BELL SOUTH'S COMPARISON OF THE FLORIDA AND GEORGIA OSS TESTS

BellSouth's Exparte Filing		AT&T's Response
FLORIDA	GEORGIA	
Role of Third Party:		
		<p><u>Florida MTP</u>-The tester is engaged by the Commission (although paid for by BellSouth).</p> <p><u>Georgia MTP</u>-The tester is engaged by BellSouth, and all changes to the plan must be approved by BellSouth.</p>
Develop the Test Plan	Yes	<p><u>Georgia MTP</u>-The initial version of the Master Test Plan (MTP), adopted by the GA PSC without revision, was prepared by and on behalf of BellSouth by personnel from BellSouth and Ernst and Young. Subsequently, HP and KPMG have each issued revisions (versions 2 and 3) but the core of the MTP remains that which BellSouth prepared.</p>
Conduct the test	Yes	
Monitor results	Yes	
Report on the test	Yes	
Clarify complex facts for accurate decision-making by state and federal regulatory agencies	Yes –	<p><u>Georgia MTP</u> -The range of issues for which this is possible in Georgia is limited by the limited scope of the Georgia Order, and the limits imposed by BellSouth's preparation</p>

BellSouth's Exparte Filing		AT&T's Response
FLORIDA	GEORGIA	
		of the test plan.
Chose KPMG to develop, implement, monitor and report on test.	Same	<p>Florida MTP-KPMG has only been chosen to conduct Phase I on the test, test plan development. No firm has been chosen for Phase II, test implementation. A vote is scheduled for December.</p> <p>Georgia MTP- Initially these roles were allocated between HP and KPMG in a manner that did not most effectively utilize their expertise. Roles have be realigned, however, BellSouth remains the principal developer of the Georgia Test. All changes to the plan must be approved by BellSouth.</p>
Build Interfaces to Test Documentation:		
Third party to build necessary OSS interfaces to determine whether the ILEC's documentation is sufficient to permit CLECs to develop their OSS in order to enter the market.	Yes	<p>Georgia MTP- In Georgia KPMG/HP is building an EDI and a TAG interface, but there are no test activities, objectives, or required reporting associated with evaluation of the documentation used to build the interfaces or the problems encountered.</p> <p>For example, there is no equivalent test objective to test PPR5 – OSS</p>

BellSouth's Exparte Filing		AT&T's Response
FLORIDA	GEORGIA	
		Interface Development Verification, and Validation Review which is contained in the Florida test. No maintenance interfaces are being built.
Tests for system flow-through and non-flow through capabilities	Yes-part of OSS functional test. In addition, GPSC ordered full audit of Percent Flow-Through Service Requests performance measurement data submitted by BellSouth in its monthly performance data filing.	Georgia MTP- The EDI and TAG functional tests make reference to flow-through transactions, but there are no associated test activities or outputs listed. The "audit" of flow-through has been revised in the most recent test plan to be an "evaluation". The revised description of the "evaluation" contains insufficient detail to allow a determination of what will be accomplished. Significantly, for the three months identified to be evaluated in the MTP there has been no BellSouth retail flow-through data reported, making a comparative evaluation impossible.
Tests full range of interfaces a CLEC Might use to exchange data with ILEC	Interfaces to be tested are Telecommunications Access Gateway ("TAG") pre-ordering, TAG ordering and EDI ordering, ECTA and TAFI maintenance; and ODUF, ADUF, CRIS	Florida MTP- The Florida test contains objectives, activities and outputs related to some manual processes. The recent DOJ evaluation of BA-NY's 271

BellSouth's Exparte Filing		AT&T's Response
FLORIDA	GEORGIA	
	and CABS billing.	<p>application was critical of the excessive reliance upon manual processes and the dearth of associated metrics or testing.</p> <p><u>Georgia-MTP</u>- The Georgia test contains no objectives, activities or outputs related to manual processes. In fact, all manually submitted OSS process transactions are specifically excluded from the test. The ECTA interface is not being tested, instead KPMG/HP will utilize a stand alone front end system BellSouth originally designed as a test tool, which has never been used by any CLEC, and that has no machine-to-machine capability. The following tests are present in the Florida draft plan, but not included in the Georgia plan: Daily Usage Feed Returns-Process Evaluation (PPR 11) Pre-Order and Order Transaction Testing of digital and resale services (TVV1) Pre-Order and Order Transaction Testing of TAG GUI. CRIS/CABs Invoicing Functional</p>

BellSouth's Exparte Filing		AT&T's Response
FLORIDA	GEORGIA	
		<p>Test for resale and digital services (TVV11) ODUF/ADUF Usage Functional Test for resale and digital services (TVV10)</p> <p>Neither test addresses the LENS interface that is still the most widely utilized interface.</p>
Assess ILEC's interface backup and restoration process	No	
Tests the systems interface certification process	Yes	<p><u>Georgia MTP</u>- The KPMG/HP EDI and TAG interface will be certified, but there are no test activities, objectives or required reporting associated with the certification process or the problems encountered.</p>
Third Party to test and review supporting documentation for OSS system development	Yes	<p><u>Georgia MTP</u> - There are no test activities, objectives or required reporting associated with evaluation of the documentation used to build the interfaces or the problems encountered such as PPR5 in Florida plan.</p> <p>Further, there are no test activities, objectives or required reporting associated with BellSouth's own OSS development, implementation or</p>

BellSouth's Exparte Filing		AT&T's Response
FLORIDA	GEORGIA	
		change management of the system components supporting CLECs.
Test adequacy of ILEC's documentation for business rules and order development	Yes	<u>Georgia MTP</u> -The documentation review is only for those limited product and service types used in the test.
Change Management:		
Evaluate change management processes by reviewing actual notices, such as modifications to business rules, to ensure the BOC is complying with established procedures.	Yes-the process and all releases through the end of the test will be tested-includes releases under Change Control (parts of releases 4.0, 4.1, 4.2, 5.0, 5.1, 5.4)	<u>Florida MTP</u> - This is only one of the more comprehensive objectives related to change management in the Florida plan. While the Florida plan is already more comprehensive than Georgia it does not comply with the guidance in the FCC/US West letter – this is expected to be corrected in the final MTP. <u>Georgia MTP</u> -As BellSouth's answer indicates the Georgia plan considers only portions of changes that BellSouth has made to the interfaces over the past 12-18 months. Test does not appear to be in compliance with FCC Staff Guidance in September 27, 1999 letter to US West. OSS99 is not reviewed as part of evaluation of change management
Performance Measurement Validation:		
Prior to testing, a performance measurement	Yes	<u>Florida MTP</u> - Additionally the FL

BellSouth's Exparte Filing		AT&T's Response
FLORIDA	GEORGIA	
system must be validated, and the test results must be measured against pre-established performance standards.		<p>PSC order requires that the third party tester evaluate the adequacy and appropriateness of all performance metrics.</p> <p>Georgia MTP- The Georgia test contains no Performance Metrics Review Test Section. (See entirety of Section IV of the Florida Draft MTP which is not included in the Georgia plan). The Georgia test Global Entrance Criteria related to metrics specifies the use of metrics identified in the GA PSC Order (the GA SQM) and only requires a determination of "operational readiness". No pre-established performance standards have been identified in the GA MTP. Even in the transaction testing, no comparison of test results will be made to CLEC data or BellSouth retail as occurs in the Florida plan.</p>
Open Process:		
CLECs should be given full access to materials provided to Third Party Vendor	No	
CLECs should monitor test to ensure that Third Party is not receiving assistance and cooperation the CLECs will not be able to	Periodic reports will be filed with the PSC. CLECs will have the opportunity to review and comment.	Georgia MTP-KPMG has issued three interim reports on a random basis (7/22/99, 9/10/99, and 10/25/99).

BellSouth's Exparte Filing		AT&T's Response
FLORIDA	GEORGIA	
enjoy.		The next interim report is expected during the week of November 15. Documents, plans, and schedules referenced in these reports are not made available to the CLECs.
Test all Functionalities:	<p>Functional testing: for UNEs; will test ability to carry an order all the way through provisioning. Will test some resale for vol. test prep.</p> <p>Volume testing: for Resale and UNEs; will test capacity of our systems to the point of Firm Order Confirmation ("FOC")</p>	<p>Georgia MTP—Functional testing: – Only five specific UNEs will be subject to functional testing. There is no comparison to retail capabilities. There is no functional evaluation of resale, and no testing at all of complex resale. CLECs were not consulted in the development of test scenarios.</p> <p>Georgia MTP-Volume Testing: Only a limited sub-set of possible resale and UNE transactions are included in volume testing. Only flow through orders will be tested. No stress testing will occur. Peak volume will only be tested in a test environment, not in the production environment.</p>
Pre Ordering:	Yes –	Georgia MTP- No retail comparison.—Metric flawed.

BellSouth's Exparte Filing		AT&T's Response
FLORIDA	GEORGIA	
Address validation	Yes	<u>Georgia MTP</u> - No retail comparison
CSR availability	Yes	<u>Georgia MTP</u> – No retail comparison. Access to a CLECs own CSR's in BellSouth's databases has been excluded from testing.
Numbering Resource Availability Due date interval and availability Editing capabilities Systems integration capabilities Telephone number verification Current PIC status verification Facilities availability	Yes	<u>Georgia MTP</u> - No retail comparison
Ordering (including integration of preordering and ordering)	Yes –	<u>Georgia MTP</u> - No retail comparison. Only for limited set of products and activity types.
Simple and complex orders	Focus on: (1) UNE analog loops, with and without number portability; (2) UNE Switch Ports; (3) UNE Business and Residence Loop/Port combinations; and (4) INP and LNP.	<u>Georgia MTP</u> -Actually functionality testing is restricted to these products. Includes no complex orders. No retail comparison
Order status reports	Yes	<u>Georgia MTP</u> -No retail comparison. Metrics flawed.
Editing capabilities Integration with other systems	Yes	<u>Georgia MTP</u> -No retail comparison.
Provisioning	Yes	<u>Georgia MTP</u> -No retail comparison.

BellSouth's Exparte Filing		AT&T's Response
FLORIDA	GEORGIA	
Sizeable quantity of orders	Yes	Georgia MTP- Restricted product set. No retail comparison. Test plan contains no quantities. There is no provisioning process evaluation (PPR9 in Florida plan)
Maintenance and repair	Yes	
Electronic bonding interface	Yes	Georgia MTP- No, the EC-CPM interface KPMG/HP will be using is not capable of electronic bonding
OSS interface availability Average OSS response interval Average answer time-repair Missed repair appointments Customer trouble report rate Maintenance average duration Percent repeat troubles (w/in 30 days) Out of Service more than 24 hours		
		Georgia MTP - There is no work center support evaluation or network surveillance support evaluation (PPR 15 and 16 in the Florida plan)
Billing	Yes	
Invoice accuracy	Yes	Georgia MTP-Metric flawed. No resale or digital services.

BellSouth's Exparte Filing		AT&T's Response
FLORIDA	GEORGIA	
Invoice timeliness	Yes	<u>Georgia MTP</u> -No resale or digital services.
Usage data delivery accuracy Usage data delivery timeliness and completeness		
Ability to capture usage data for all calls including local and access	Yes	<u>Georgia MTP</u> - There is no SQM measurement to determine if usage data is accurate.
Audit of BOC's end-user billing, Wholesale billing	UNE related billing	
		<u>Georgia MTP</u> - There is no billing work center evaluation (PPR10 nor Daily Usage Feed Return Evaluation (PPR11) as is in Florida plan)
Relationship Management and Infrastructure (RMI)		
CLEC Training	Yes	<u>Georgia MTP</u> - No, in Georgia, there are no test activities, objectives or required reporting associated with evaluation of the CLEC training or the problems encountered. (Test objective PPR4 addresses this in Florida, no such test objective exists in the Georgia plan)
Help desks	Yes (LCSC and UNE Center) –	<u>Georgia MTP</u> - No, in Georgia, there are no test activities, objectives or required reporting associated with evaluation of the help desks or the

BellSouth's Exparte Filing		AT&T's Response
FLORIDA	GEORGIA	
		problems encountered. (Florida test objectives such as PPR3 and PPR8 do not exist in the Georgia plan.)
		Florida MTP-A test objective for Account Establishment and Management Verification and Validation Review exists in the Florida. Georgia MTP-No such test objective exists.
Interface change control	Yes	Georgia MTP- As BellSouth's answer above indicates the Georgia plan considers only portions of changes that BellSouth has made to the interfaces over the past 12-18 months.
Network design and collocation requests	No	
Forecasting of CLEC demands for network resources and facilities	Yes	
Stress Test		
Volume stress test appropriate to the market to cover multiple days	Volume data to be developed by service and order type for: Resold Services, Unbundled Network Elements (including combinations of elements), Pre-Ordering transactions, and Trouble reports.	Georgia MTP- The Georgia volume tests address only normal and peak, not stress testing and utilize a restricted transaction set. The Normal and Peak Volume tests both will be run against a simulation of BellSouth's production systems. All

BellSouth's Exparte Filing		AT&T's Response
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		Test Bed data for these tests is in databases isolated from production and used only by the simulated systems. A third test proposed for the first time in KPMG's revision to the Georgia MTP is identified as a "Production Volume" test. As currently described it is not clear what volume and mix of transactions will be used in this test (current production volumes, BellSouth's stated capacity volume, YE01 volume), but it is described as being run against the installed production suite of hardware/software.
Test Scenarios		
Full Range of Orders	Functional testing of UNES; volume testing of UNES and Resale	<u>Georgia MTP</u> - The test is limited as noted above.
Realistic Mix of Orders	Yes	<u>Georgia MTP</u> – No, the scope is limited as noted above.
Submission of Orders		
Track LSRs based on BOC provided documentation	Yes	<u>Georgia MTP</u> - Unsure as to what BellSouth is describing from the Florida Test, however as noted above it will not be in scope to track

BellSouth's Exparte Filing		AT&T's Response
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		manual LSRs or complex resale LSRs in the Georgia test
Test Bed:		
Provide sufficiently large quantity	Yes	Georgia MTP- KPMG's 2nd and 3rd Interim Reports indicate that this has not yet been achieved in the Georgia test.
Ensure sample is not "clean" data	Yes	
Test accounts created in ILEC's production systems, in actual central offices spread across the State, not in a separate test system	Volume data will be developed from actual transaction data, CLEC forecasts, and case studies of market share changes in related markets. Two test families: (1) testing system-not connected to central offices; (2) production system-connected to actual central offices.	Georgia MTP – The Normal and Peak Volume tests will both be run against a simulation of BellSouth's production systems. All Test Bed data for these tests is in databases isolated from production and used only by the simulated systems. A third test proposed for the first time in KPMG's revision to the MTP is identified as a "Production Volume" test. As currently described it is not clear what volume and mix of transactions will be used in this test (current production volumes, BellSouth's stated capacity volume, YE01 volume), but it is described as being run against the installed production suite of hardware/software.
"Blind" Testing		

BellSouth's Exparte Filing		AT&T's Response
FLORIDA	GEORGIA	
Orders should be submitted to the BOC without it knowing when they will arrive	Yes	<p>Florida MTP- This is only one of several measures in the Florida plan designed to enhance the blindness of the test effort. Additional activities include test bed design (larger and more diverse than Georgia), unannounced work site visits, and the use of CLEC production orders. The Georgia plan does not appear to utilize unannounced work site visits not CLEC production orders.</p> <p>Georgia MTP-The Georgia MTP states that the "The Test Cycle Manager will 'coordinate' efforts with BellSouth to ensure that BellSouth's and KPMG's performance measurement systems are prepared to track test transaction performance prior to beginning the test." as a preliminary activity for each individual test. Also, none of the additional measures described above in the Florida MTP appear in the in the Georgia MTP.</p>
Military Style Testing		
Test until you pass.	Yes –	<p>Florida MTP– This is not currently specifically addressed in the Draft MTP but is expected to be in the</p>

BellSouth's Exparte Filing		AT&T's Response
FLORIDA	GEORGIA	
		Final MTP. Georgia MTP- The process by which this will be accomplished is not documented within the GA MTP and has not been shared with the CLECs:
XDSL OSS Capabilities:		
Access to loop qualifications	No	
BOC bandwidth management information	No	
"Regression" Testing after Problems Found	Yes	Georgia MTP- The process by which this will be accomplished is not documented within the GA MTP and has not been shared with the CLECs.
BOC must demonstrate resolution of problems	Yes --	Georgia MTP- The process by which this will be accomplished is not documented within the GA MTP and has not been shared with the CLECs.
		Florida MTP- The MTP provides for methods of testing for parity Georgia MTP- Only one process review, a portion of Maintenance and Repair, will compare wholesale to retail. CLEC experience will not be included in the analysis.

**Comparison of Georgia Master Third Party Test Plan (Version 3.0)
to September 27, 1999 letter from FCC Staff to US West**

1. Performance Measures Evaluation

Key Requirements of FCC Letter ¹	Compliance of Version 3.0 Plan
<ul style="list-style-type: none"> • An evaluation would include an assessment of whether the raw data being collected by the BOC is accurate, which could be tested by observing the raw data collection processes and by comparing the BOC's raw data to independently-collected data. • The evaluation would assess the processes by which the raw data is filtered and transformed into final, reported results. • The evaluator would assess whether the BOC's data collection and data processing functions are consistent with the published performance measurement business rules. • The evaluator would assess the adequacy and functioning of the BOC's internal controls over the data collection processes and the software programs that process the data (such as the controls over personnel access to the databases, and the controls that ensure that the programs and program modifications are properly authorized, documented, tested and approved). • The evaluation would include an independent quantitative verification of the reported performance data. To accomplish this, the evaluator could be provided with the BOC's raw data and independently process the data, 	<ul style="list-style-type: none"> • A limited data comparison is being conducted on the test data for the very restricted services and order types subject to the test. Other than flow-through, this analysis is being conducted using no commercial data. It is unlikely that even the flow-through evaluation will include a review of retail data because for the three months selected for the evaluation (July, August, and September), BellSouth provided no retail data. There is no indication of observation of BellSouth's data collection processes to verify accuracy of the data • Again, there appears to be no analysis of BellSouth's processing of information for performance measures purposes, only a comparison of BellSouth's test data collection to the tester's data collection for specific transactions is required by the test. Again, no retail data will be reviewed. • There are no test objectives in the Georgia plan necessary for this evaluation to occur. • There are no test objectives in the Georgia plan necessary for this evaluation to occur. • There are no test objectives in the Georgia plan necessary for this evaluation of reported performance data to occur except for possibly the flow-through evaluation. Business rules necessary to calculate this measure are not

¹ The letter is "intended to provide a summary of *key* elements of a third party test which could assist our determination that a BOC's OSS is operationally ready and capable of efficiently supporting ever-increasing volumes of transactions. *It is not, however, intended to be an exhaustive list* of the necessary elements for a successful third party test." (Emphasis added)

<p>pursuant to the business rules, to ensure that the stated calculations and algorithms have been accurately applied.</p> <ul style="list-style-type: none"> We note that a comprehensive evaluation of the BOC's performance measure processes may include elements in addition to those listed above, as determined by the states or by an independent evaluator. Accordingly, we encourage BOCs to make the details of the proposed evaluation available to the Commission, and to the public, as they are developed. 	<p>included in BellSouth's SQM. No retail data is being evaluated.</p> <ul style="list-style-type: none"> There are no test objectives in the Georgia plan necessary for this type of comprehensive evaluation to occur such as Section IV of the Florida draft MTP.
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2. Change Management Test

Key Requirements of FCC Letter	Compliance of Version 3.0 Plan
<ul style="list-style-type: none"> Review of change management process and procedures Review of implementation of these procedures. Evaluate the methods and procedures that the BOC employs to communicate with CLECs regarding OSS system performance and system updates Assess the BOC's change management processes and should include, but not be limited to, a review of the BOC's ability to implement at least one significant software release. 	<p>The Georgia MTP conducts a review of change management for the Electronic Interface Change Control Process and Carrier Notifications. However, it excludes the myriad of other changes made by BellSouth which affect CLECs. It is unclear how the implementation of change management will be evaluated. There appears to be no usage or observation of the change control process, merely a document review. There appears to be no evaluation of the implementation of a software release such as OSS99. There appears to be no opportunity for CLEC input regarding their experience with BellSouth's change practices. It does not appear that the evaluation will analyze the process regarding availability of dispute resolution. There is no evaluation of BellSouth's change management process for new interface software or changes that have been mandated by regulatory bodies. Further, there are no test activities, objectives or required reporting associated with BellSouth's own OSS development, implementation or change management of the system components supporting CLECs.</p>

3. xDSL Testing

Key Requirements of FCC Letter	Compliance of Version 3.0 Plan
The third-party test would test significant volumes of xDSL orders (<i>i.e.</i> , xDSL capable loops).	There is no testing of xDSL orders.

4. Normal, High, Stress Volume Testing

Key Requirements of FCC Letter	Compliance of Version 3.0 Plan
<ul style="list-style-type: none"> • Normal and High Volume Testing: The third-party test would test projected normal and high volumes of pre-order and order transactions that flow-through the BOC's systems. The mix of transactions would replicate expected CLEC ordering patterns by including, for instance, error conditions and change orders, and by covering the process end-to-end (<i>i.e.</i>, through the receipt of order confirmation notice or electronic error notice). "Normal" volumes would be based on the BOC's reasonable estimate, with input from CLECs, of daily order volumes. "High" volumes would be significantly greater than normal volumes and based on the BOC's reasonable estimate, with input from CLECs, of forecasted demand. • Capacity or Stress Testing: The third-party stress test would assess scalability of the BOC's OSS systems by testing a mix of transactions similar to those in the normal and high volume testing. These volumes would be significantly greater than the high volume test and be sufficient to identify potential weak points in the systems. 	<ul style="list-style-type: none"> • Normal and volume testing are being conducted. However, they are being conducted in a test environment (RSIMMS), not BellSouth's production environment. Although a new test objective (O&P-10) appears to attempt to offset this deficiency, the plan contains contradictory language as to whether this test for production capacity will occur for YE01 (e.g. "normal") or under current transaction loads. Neither scenario tests peak volumes. The methodology for calculating YE01 and peak volumes is unclear, and CLECs were not involved in establishing the volumes. The volumes and transaction mixes have not been provided. • There is no stress test in Georgia.

5. Pseudo CLEC

Key Requirements of FCC Letter	Compliance of Version 3.0 Plan
<p>If no CLEC has constructed an interface with whatever OSS system the BOC is relying on to meet the nondiscriminatory obligations set forth in the 1996 Act, the third-party tester should build a pseudo-CLEC. The pseudo-CLEC should build an interface <i>not only to test the quality of the BOC's documentation</i> for such OSS systems but also to ensure that these systems are capable of submitting and receiving valid transactions. The pseudo-CLEC should build the interface(s) using the BOC's documentation and business rules to determine whether any CLEC can build an interface based upon these materials. Third-party testing can be conducted using orders from a combination of existing CLECs and a pseudo-CLEC.</p>	<p>It appears that EDI and TAG interfaces are being built to conduct some transaction testing. However, there are no test objectives in the Georgia plan necessary for an evaluation of the quality of BellSouth's documentation and a CLEC's ability to build using publicly available information to be conducted as part of the EDI/TAG build. (By contrast, see RMI2 in New York MTP and PPR5 in Florida draft MTP.) Additionally, the build necessarily only covers the limited products and services being tested. OSS99 will not be tested.</p> <p>It does not appear that any existing or "live" CLEC orders will be used in the Georgia test.</p> <p>No repair interface is being built.</p>

6. Dissemination of Information

Key Requirements of FCC Letter	Compliance of Version 3.0 Plan
<p>A third-party test of OSS should include a formal, predictable and public mechanism for the third-party tester to communicate to both the BOC and the CLEC community issues identified by the third-party tester that arise during the course of testing. Staff proposes the following options for reporting problems:</p> <ul style="list-style-type: none"> • Report issues as they arise; or • Issue reports pursuant to a specified time-frame (<i>i.e.</i>, weekly or bi-weekly); or • Issue an interim report in the middle of the test and a final report at the end. <p>Combinations of these options could provide optimal balance between frequency and detail.</p>	<p>KPMG currently issues interim reports. However, they are issued on an unspecified and infrequent basis. Three reports have been issued to date: July 22, September 10, and October 25. Issues are not reported as they arise, nor are reports issued pursuant to a specified time frame. Reports are not detailed and are therefore frequently unclear. This lack of clarity is exacerbated due to overall lack of communication and CLEC involvement in the process.</p> <p>Additionally, despite indications of difficulties in the interim reports, no exception reports have been issued.</p>

7. Functionality

Key Requirements of FCC Letter	Compliance of Version 3.0 Plan
<ul style="list-style-type: none"> • CLECs would be consulted in developing the test scenarios to reflect their market entry and growth and expansion scenarios in a particular region. • Functionality testing would be conducted for pre-ordering, ordering, provisioning, maintenance and repair, and billing transactions. The transaction mix should replicate CLEC ordering patterns and include, for instance, orders that fall out for manual processing, orders that contain errors, and order changes and supplements. Functionality testing also would test these transactions end-to-end (<i>i.e.</i>, orders should be actually provisioned), as applicable. 	<ul style="list-style-type: none"> • CLECs were not consulted as part of the test plan development. • Some functionality testing is being conducted. However, it is very limited and therefore does not replicate CLEC ordering patterns for resale nor for UNE services. Any testing of flow through as part of functionality testing does not evaluate wholesale flow through compared to retail flow through. (See flow through definitions included in footnote 2 of FCC letter to US West.).